

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER : 21 MC 100 (AKH)
SITE LITIGATION : (All Cases)
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IN RE COMBINED WORLD TRADE CENTER : 21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE : (All Cases)
LITIGATION (straddler plaintiffs) :
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**NOTICE OF JOINT MOTION TO DISMISS CLAIMS
AGAINST PHILLIPS & JORDAN, INC.**

PLEASE TAKE NOTICE that on a day to be determined by this Court, Plaintiffs' Co-Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP and Attorneys for Defendant, Phillips & Jordan, Inc., McGivney & Kluger, P.C., shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for Order seeking the dismissal of certain plaintiffs' claims against defendant Phillips & Jordan, Inc with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(2).

Dated: New York, New York
April 27, 2011

/s/ Christopher R. LoPalo
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